

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: REMBRANDT TECHNOLOGIES, LP
PATENT LITIGATION

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)
) MDL Docket No. 07-md-1848 (GMS)
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**DECLARATION OF COLLINS J. SEITZ, JR., SUBMITTED IN SUPPORT OF
APPLICATION FOR APPOINTMENT OF LEAD AND LIAISON COUNSEL
FOR REMBRANDT TECHNOLOGIES, LP**

I, Collins J. Seitz, Jr., hereby declare as follows:

1. I am a partner with the law firm of Connolly Bove Lodge & Hutz LLP and am a member in good standing of the Delaware Bar and this District. I submit this Declaration in support of the Motion for Appointment of Lead and Liaison Counsel for Rembrandt Technologies, LP ("Rembrandt").

2. Rembrandt has asked me to be its lead and liaison counsel in this MDL case. I understand the time demands that will accompany my appointment as lead and liaison counsel for Rembrandt, and am willing and able to handle those demands if the Court approves my appointment.

3. I expect that in my role as liaison counsel for Rembrandt, I will be charged as the lead contact person for administrative matters such as communications between the Court and the other counsel for Rembrandt, convening meetings of counsel, advising parties of developments, assisting in the coordination of pretrial litigation activities, managing document depositories, and resolving scheduling conflicts. I commit to carrying out these responsibilities.

4. I further expect that in my role as lead counsel for Rembrandt I will be charged along with co-counsel with formulating and presenting positions on substantive and procedural issues during the litigation, presenting written and oral arguments and suggestions to the Court, working with opposing counsel in developing and implementing a litigation plan, initiating and organizing discovery requests and responses, coordinating examination of deponents by Rembrandt's counsel, employing experts, arranging for support services, and ensuring that schedules are met. I commit to carrying out these responsibilities

5. I have been practicing law in Delaware courts since 1983, and am a partner in the Connolly Bove law firm. Connolly Bove is headquartered in Wilmington, Delaware, with other offices in Washington, D.C., and Los Angeles, California. I have been involved in significant litigation in this Court, Superior Court, and the Court of Chancery, as well as in courts outside this State, and have also represented clients in non-litigation legal proceedings and counseling. In conjunction with these cases and other engagements, I have worked cooperatively with other lawyers, as well as clients and other professionals.

6. I have served as a member, and from 2004 to 2006 as Chair, of the Delaware Board of Bar Examiners. In 2004, I received from the District Court the Caleb Layton Distinguished Service Award, awarded to attorneys for service to the Court in representing indigent clients in federal cases. I am a Board member of the Delaware Community Legal Aid Society, Inc. I am often chosen to act as a mediator and arbitrator in complex corporate and commercial cases.

7. I have significant experience with complex litigation. I have represented clients in complex litigation matters before this Court and other federal courts, including the pending original jurisdiction case in United States Supreme Court *New Jersey v. Delaware* (U.S. 2006), and the recent intellectual property case *Pfizer Inc. v. Ranbaxy Labs Ltd.* (D. Del. 2005) (patent litigation). I have substantial experience in intellectual property litigation in this District, and have represented clients in significant corporation law cases in the Delaware Court of Chancery. I am currently involved along with co-counsel representing plaintiffs in a MDL litigation pending in the District of Kansas.

8. In 2005, I was elected to membership in the American College of Trial Lawyers, which represents the top one percent of trial attorneys in each state.

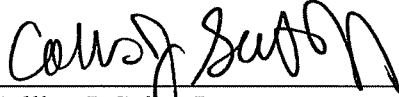
9. I am familiar with the Manual for Complex Litigation, Fourth, as well as this Court's Local Rules.

10. My resources include the many experienced intellectual property attorneys of Connolly Bove, the experienced attorneys from other firms that represent Rembrandt in the various individual cases, and technology and administrative resources employed by all of the law firms representing Rembrandt in this case.

11. My partner, Francis DiGiovanni, who along with other Connolly Bove attorneys will assist me in the representation of Rembrandt in this case, has represented clients as lead or local counsel in dozens of patent cases in this Court, including as *de facto* coordinating counsel for the defendants in the *In re Manchak Patent Litigation* (D. Del. MDL 2001).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This Declaration is executed this 15th day of November, 2007.



Collins J. Seitz, Jr.

CERTIFICATE OF SERVICE

I, Collins J. Seitz, Jr., hereby certify that on the 15th day of November, 2007, a true copy of the foregoing **DECLARATION OF COLLINS J. SEITZ, JR. SUBMITTED IN SUPPORT OF APPLICATION FOR APPOINTMENT OF LEAD AND LIAISON COUNSEL FOR REMBRANDT TECHNOLOGIES, LP** was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the following and the document is available for viewing and downloading from CM/ECF:

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